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Sierra Grande Broadcasting  
PO Box 51  
Des Moines, New Mexico 88418-0051

September 16, 2002

Federal Communications Commission  
445 Twelfth Street, S. W.  
Washington, DC 20554

Reference: MM 02-166  
MM 02-14  
MM 02-12

I request that the FCC **deny** Millcreek Broadcasting, LLC.'s **petition for rule making** for **Coalville, Utah 276C**, and **accept** Sierra Grande Broadcasting's **petition for rule making** for **Salina, Utah 276C**. Millcreek, through their attorney, has shown that they are unwilling to negotiate a solution that is acceptable to both of us. Millcreek wants me to give up my site unrestricted Salina, Utah 276C proposal, that was received at the FCC mail room on October 9, 2001, and accept their site restricted counterproposal of Salina, Utah 300C, that was received at the Office of the Secretary of the FCC on March 18, 2002. Since my proposal was at the FCC for over five months before Millcreek delivered their counterproposal, I will accept only a site unrestricted Class C FM allotment as the replacement for my proposed Salina, Utah 276C allotment.

Since I was being asked to give up my site unrestricted proposal for their site restricted counterproposal, I wanted the owner of the counterproposal to pay the expenses of moving KBKL from 300C to 298C. This would allow for the counterproposal to be less restrictive to me. The attorney for Millcreek responded with accept the Salina, Utah 300C counterproposal as is.

Millcreek desires that, in order for them to expand their stations in the Utah area, I build a

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Class C FM station in the Sevier River Valley. The map that is generated from the FCC Internet site shows that the coordinate is just west of the river. A river is always the lowest point in a valley. From the site that their engineer has selected, I can see toward the south, and northeast (toward Salina), but the site is surrounded by mountains in all other directions. I can only go up Mount Belknap a short distance, before I start to get to far from Salina. The mountainous terrain will prevent the coverage area that Reynolds Technical Associates claim the Salina 300C, Exhibit E, Figure 20, will cover from the site that they selected. It is a nice pretty circle, but FM broadcast signal's are line-of-sight. That is the reason why FM broadcasters want high locations. Looking at my maps, I cannot find a site that: has the elevation, meets separation requirements, that can see Salina, and is close enough to Salina, for the Salina 300C as it is counter proposed.

Millcreek's KUDD, Roy, Utah is 269.4 km from KMGR's, Delta, Utah, transmitter site on White Pine Peak. KBKL, Grand Junction, Colorado is 306.3 km from White Pine Peak. White Pine Peak is too close to KUDD for a Salina, Utah 300C on that peak. KBKL is 254.5 km from Mount Terrill. KUDD is 290.8 km from Mount Terrill. Millcreek has implied, through their attorney, that they will refuse to pay the expense of moving KBKL from 300C to 298C. Both Mount Terrill and White Pine Peak had radio sites. Both sites have electrical power. Both sites are in Fishlake National Forest. Both sites overlook Salina, Utah.

Spectrum Scan also delivered a counterproposal to the Office of the Secretary of the FCC for 246A at Beaver, Utah on March 18, 2002. Mount Belknap is between the two counter proposals. The two counter proposals were not mutually exclusive, unless both were going to build transmitter sites on Mount Belknap. I am not interested in a Beaver, Utah 300C allotment.

  
Willison H. Gormly